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May 10, 2022

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**
Requests for Extension of Time and to File Under Seal

Dear Judge Preska:

With the consent of Defendant, I write on behalf of Plaintiff Virginia Giuffre to respectfully request a brief extension of time, until Friday, May 20, 2022, to respond to Defendant's letter-motion, filed under seal on May 9, 2022, *see* Doc. 474, and to allow Defendant until May 25, 2022 to file his reply. Pursuant to Local Rule 6.1, Plaintiff's response to Defendant's letter-motion would be due on May 16, 2022 and Defendant's reply on May 18, 2022 absent this requested extension of time.

In support of this request, I represent that Plaintiff's legal team has professional obligations in other matters that necessitate this brief delay. Specifically, counsel has multiple depositions and a mediation on May 16, 17, and 18, 2022. In addition, counsel will be traveling this week and have personal family obligations related to high school graduation that cannot be rescheduled. And, as noted above, Defendant has consented to this request provided he is given until May 25, 2022 to file his reply. The requested extension of time will not impact any other deadlines or impede the progress of this case.

In addition, pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff also respectfully requests leave to file under seal her response to Defendant's letter-motion. In support of this request, I note that the Court granted Defendant leave to file his letter-motion under seal, *see* Doc. 473 (May 9, 2022), and Plaintiff will both be responding to that sealed filing, as well as possibly attaching documents that have been designated as confidential under applicable protective orders. Plaintiff will file sealed versions of her letter and any necessary exhibits, until such a time when Plaintiff's deposition has concluded and confidentiality designations are resolved or Your Honor so orders, after which Plaintiff will be prepared to file unsealed and lightly redacted versions.

Respectfully,

s/Nicole J. Moss

Nicole J. Moss

cc: Counsel of Record